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UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

April 18, 2025

Nathan Ochsner, Clerk of Court

United States of America
v.

Jennifer Jesselle Perez
Rodriguez

Case No. **4:25-mj-236**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/17/2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 111

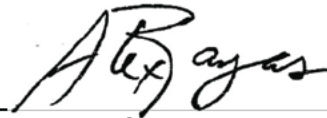
Offense Description

Assaulting, resisting, or impeding a federal officer

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

Alexander Andres Rayas, Special Agent, FBI

Printed name and title

Sworn to by telephone.

Date: April 18, 2025

City and state: Houston, Texas



Judge's signature

Dena Hanovice Palermo, U.S. Magistrate Judge

Printed name and title

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ATTACHMENT A

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Alexander Andres Rayas, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been since November 18, 2016. As a Special Agent with the FBI, I have investigated various financial crimes including money laundering, mail fraud, wire fraud, and embezzlement, along with other federal criminal violations. I am currently assigned to the violent crimes squad in Houston, TX. I hold a Bachelor of Science degree in business with a concentration in computer information systems. I hold a master's degree in business administration.
2. This Affidavit is made in support of a criminal complaint charging Jennifer Jesselle Perez Rodriguez (hereafter referred to as "RODRIGUEZ") with Assaulting, resisting, or impeding certain officers of employees in violation of Title 18 U.S.C. § 111. I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and my conversations with other law enforcement officers involved in this investigation.
3. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause that violations of Assaulting, resisting, or impeding certain officers of employees in violation of Title

18 U.S.C. § 111 have been committed by RODRIGUEZ. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

PROBABLE CAUSE

4. On April 17, 2025, Special Agents from the Federal Bureau of Investigation (“FBI”), Drug Enforcement Agency (“DEA”), and Homeland Security Investigation (“HSI”), were conducting an Unaccompanied Child Welfare Check in the area of Milan Dive and E. Anderson Drive, Houston, Texas 77047, which is located in the Southern District of Texas. The FBI, DEA and HSI team members were all in their own vehicles and were exiting the Anderson Oaks Park, located at 600 E Anderson Road, Houston, TX 77047. The four unmarked vehicles were lined up in a caravan as they exited the Anderson Oaks Park and began to head westbound on E Anderson Road. After the completion of the welfare check and during the departure of the Anderson Oaks Park complex, a female subject, RODRIGUEZ, was standing outside of Del Papa Store, located at 555 E Anderson Road, Houston, TX 77047 (hereafter referred to as “Del Papa Store”.) After two of the unmarked vehicles drove past the Del Papa Store, RODRIGUEZ walked on E Anderson Road and unsheathed a machete in her right hand. RODRIGUEZ swung the machete multiple times and then began moving on foot, increasing in speed until she was running towards the two unmarked vehicles that were at the intersection of E Anderson Road and Milan Drive, who were driving out of the Anderson Oaks Park complex. The nearest vehicle to RODRIGUEZ was occupied by the FBI Agent, who was driving their FBI issued vehicle as a part of their official duties. As RODRIGUEZ began to run towards the FBI Agent’s vehicle, a siren was activated from an unmarked unit’s vehicle. The FBI Agent opened the door of their vehicle and gave commands to RODRIGUEZ to drop the machete. RODRIGUEZ failed to comply with the FBI Agent’s commands. The FBI Agent discharged their FBI issued firearm at RODRIGUEZ, which struck her

in the upper thoracic area until she no longer posed a threat to the Special Agents. RODRIGUEZ was struck several times and had aid rendered to her on scene before being transported by an ambulance to Ben Taub Hospital, located at 1504 Ben Taub Loop, Houston, TX 77030.

5. Video footage was retrieved from the Del Papa Store's surveillance system, which has several cameras placed inside and outside of the store. One specific camera faces south and overlooks a portion of the parking lot and E Anderson Road and showed RODRIGUEZ walk into the middle of E Anderson Road. RODRIGUEZ then pulls out a machete in her right hand and waves it multiple times in the direction of the FBI Agent's vehicle while walking towards said vehicle. The camera then captures RODRIGUEZ increasing in speed until she was running towards the FBI Agent's vehicle before RODRIGUEZ runs out of view of the camera.

6. On April 17, 2025, Amer Khan (Referenced hereinafter as "KHAN"), was interviewed by FBI Agents. KHAN is the manager of the Del Papa Store and was working at the store when RODRIGUEZ entered the store earlier in the day. RODRIGUEZ was seen inside the store with her machete. RODRIGUEZ was described as trying to start fights with KHAN's customers in and around Del Papa Store. After getting into a fight in front of the store, KHAN kicked RODRIGUEZ out of the store. RODRIGUEZ was last seen by KHAN exiting the store with her machete. Additional video footage was retrieved from the home surveillance system of the resident of 600 E Anderson Road, Unit 400, Houston, TX 77047. The home surveillance system had a camera that faced north and overlooks E Anderson Road from Anderson Oaks Park and also captures audio. The camera that faced E Anderson Road follows motion and pans east and west as it follows motion. The camera pans west on E Anderson Road and the audible sound of sirens is heard, before the camera overlooks the intersection of E Anderson Road and Milan Drive, where the FBI Agent's vehicle can be seen exiting the Anderson Oaks Park. The audible sound of multiple gunshots are

heard, and the upper body of RODRIGUEZ can be seen falling towards the front driver's side of the FBI Agent's vehicle.

CONCLUSION

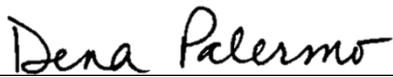
7. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Jennifer Jesselle Perez Rodriguez in violation of Title 18 U.S.C. § 111 (Assaulting, resisting, or impeding certain officers or employees).

Respectfully submitted,



Alexander Andres Rayas
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me telephonically on this the 18th day of April 2025.



Honorable Dena Hanovice Palermo
United States Magistrate Judge
Southern District of Texas